

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

LISA NELSON, personally and as assignee of claims belonging to the Shanandoah Trust, H. Lundahl Telford personally and as assignee to the claims of Marti Lundahl,)	Case No. 8:16CV368
)	
Plaintiffs,)	MOUNTAIN WEST FARM BUREAU MUTUAL INSURANCE COMPANY'S MOTION FOR ENLARGEMENT OF TIME
v.)	
MOUNTAIN WEST FARM BUREAU MUTUAL INSURANCE COMPANY;)	
JEFFREY A. DONNELL; GEORGE E.)	
POWERS, LAW OFFICES OF)	
SUNDAHL, POWERS, KAPP &)	
MARTIN; D. CHRISTINSEN; U.S.)	
POSTAL EMPLOYEES SUSAN)	
AUKEMA and PAMELLA GEE and)	
DOES 1-10,)	
)	
Defendants.)	

COMES NOW the defendant, Mountain West Farm Bureau Mutual Insurance Company ("Mountain West"), and moves the Court for an enlargement of the time for defendant Mountain West to respond to plaintiffs' First Amended Complaint.

In support of this motion, Mountain West represents to the Court that this defendant first became aware of the legal proceedings in the Madison County District Court when Mountain West was served with the First Amended Complaint on July 25, 2016, setting an answer date for August 24, 2016. Following a recent review of the Madison County docket entries, Mountain West learned that on August 5, 2016, defendant D. Christinsen filed a Notice of Removal to the U.S. District Court for the District of Nebraska, which notice was not served upon Mountain West.

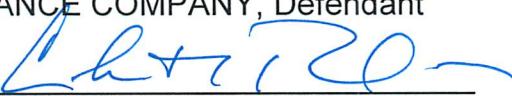
Mountain West further shows to the Court that counsel for Mountain West has exchanged e-mail correspondence with plaintiff Lisa Nelson during which no mention was made by plaintiff Lisa Nelson that this matter had been removed to federal court. Upon checking the federal court docket, Mountain West also notes that defendant Donnell currently has on file a Motion to Remand this case to state court because that defendant does not consent to removal. Mountain West requests an additional 15 days from August 15, 2016, to file its response to plaintiff's First Amended Complaint.

WHEREFORE, Mountain West prays that its time to respond to plaintiff's First Amended Complaint be extended to August 30, 2016.

Dated this 15th day of August, 2016.

MOUNTAIN WEST FARM BUREAU MUTUAL
INSURANCE COMPANY, Defendant

By: _____


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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon the following individual(s) by electronic service through the court or by regular United States Mail, postage prepaid, this 15 day of August, 2016 and addressed as follows:

Lisa Nelson
229 N. Pine Street
Gordon, NE 69343

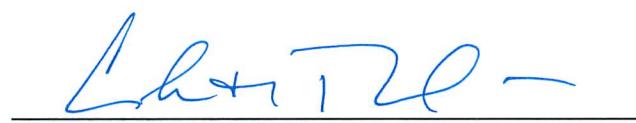
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13106-1/6AT4579



Christopher J. Tjaden